

REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 1 through 37, 39, and 40 are pending, with Claims 1, 11, 17, and 27 being independent. Claims 1, 11, 17, 27, and 37 have been amended. Claims 39 and 40 have been added.

Claims 1, 11, 17, and 27 have been amended as discussed at the September 19, 2006 interview, and Applicant understands from the interview that the Examiner is in tentative agreement that such an amendment would obviate the 35 U.S.C. § 112, 1st paragraph, rejection of those claims.

Claim 37 has been amended as discussed at the September 19, 2006 interview, and Applicant understands from the interview that the Examiner is in tentative agreement that such an amendment would obviate the 35 U.S.C. § 101 rejection of that claim.

With respect to the 35 U.S.C. §§ 102 and 103 rejections of Claims 1 through 37 over the Ang, et al. article and U.S. Patent Appln. No. 2002/0105531 A1 (Niemi) and further in view of Applicant's own specification, Applicant respectfully maintains his traversal of said rejections.

During the interview, discussion was made of Niemi's metadata. That patent says, for example, that the metadata "could be shown or activated when an image is presented or a corresponding area in the presentation image is activated..." and "could be e.g. some text describing or giving facts about the contents of the image, or a sound file or

a video file that is played when presenting the image. Further, the meta data could comprise search criteria...." (col. 8-9).

Applicant respectfully submits that Niemi's metadata provides neither a description nor a suggestion of the feature of at least one management function implemented in a computer-executable language for navigation in the image, as recited, *inter alia*, in Claims 1, 11, 17, and 27.

Applicant also respectfully submits that Ang, et al. and the relied-upon portion of Applicant's own specification are likewise deficient.

By means of such a feature, Applicant respectfully submits that the present invention allows more flexibility to the management function.

It is further respectfully submitted that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the art to arrive at such a claimed feature.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above.

In this regard, Applicant respectfully understands that the Examiner is in tentative agreement that Claim 40 avoids the outstanding 35 U.S.C. §§ 102 and 103 rejections.

Therefore, separate and individual consideration of each dependent claim is respectfully requested.

Applicant submits that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

/Daniel S. Glueck/
Attorney for Applicant
Daniel S. Glueck
Registration No. 37,838

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3800
Facsimile: (212) 218-2200

DO_MAIN 255671v1